

1 SHAFFY MOEEL (State Bar No. 238732)
MOEEL LAW OFFICE
2 shaffymoeel@gmail.com
3 1611 Telegraph Ave. Ste. 806
4 Oakland, CA 94612
Telephone: (415) 735-5021

5 Attorneys for Defendant
6 MARIA ALICIA TORRES GUTIERREZ

7 UNITED STATES DISTRICT COURT
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9 NORTHERN DISTRICT OF CALIFORNIA
10
11 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MARIA ALICIA TORRES GUTIERREZ,

15 Defendants.
16

Case No.: 18-CR-0458-RS

**STIPULATION AND ORDER
CONTINUING STATUS
CONFERENCE AND EXCLUDING
TIME UNDER THE SPEEDY TRIAL
ACT**

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18 This matter is presently set for a status conference on August 6, 2019. The government has
19 produced discovery to the defendant, including wiretap recordings, pursuant to the terms of a protective
20 order. Ms. Torres Gutierrez is currently on pretrial release and resides in the Central District of
21 California. The parties have been diligently working towards a resolution of this case. Defense counsel
22 continues to explore the possibility of resolving this matter in the Central District of California pursuant
23 to Rule 20 of the Federal Rules of Criminal Procedure. The government is working on providing a
24 draft plea agreement to the defense should the case not resolve through a Rule 20 transfer to the Central
25 District. The parties are confident that this will be the final request for a continuance of a status hearing
26 before this Court. For these reasons, the parties stipulate and respectfully request the Court continue
27 the status conference from August 6, 2019 to September 10, 2019 at 2:30 p.m.
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STIPULATION AND PROPOSED ORDER
Case No.: 18-CR-0458-RS

1 For the same reasons, the parties also stipulate that the time between August 6, 2019 and
2 September 10, 2019, should be excluded from calculation under the Speedy Trial Act for the effective
3 preparation of counsel and that ends of justice served by any such continuance outweigh the best
4 interests of the public and the defendant in a speedy trial.

5 IT IS SO STIPULATED this 5th day of August, 2019.

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7 MOEEL LAW OFFICE

8 /s/ _____

9 SHAFFY MOEEL

Attorney for Maria Alicia Torres Gutierrez

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11 DAVID L. ANDERSON

United States Attorney

12 /s/ _____

13 NIKHIL BHAGAT

Assistant United States Attorney

14 Attorneys for the United States
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1 **ORDER**

2 For good cause shown, with respect to defendant Maria Alicia Torres-Gutierrez, the status
3 conference hearing presently set for August 6, 2019 at 2:30 p.m. is continued to September 10, 2019 at
4 2:30 p.m. Based upon the stipulation of counsel and for good cause shown, the Court finds that failing
5 to exclude the time between August 6, 2019, and September 10, 2019 would deny counsel the
6 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
7 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the
8 time from August 6, 2019 through and including September 10, 2019, from computation under the
9 Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. Having
10 made these findings, it is hereby **ORDERED** that the time from August 6, 2019 through and including
11 September 10, 2019, shall be excluded from computation under the Speedy Trial Act as to this
12 defendant. 18 U.S.C. § 3161(h)(7)(B)(iv).

13 PURSUANT TO STIPULATION, IT IS SO **ORDERED** this 5th day of August, 2019.

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15 THE HONORABLE RICHARD SEEBORG
16 UNITED STATES DISTRICT JUDGE
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